

February 19, 2002
Ref. No.: GA02-011

Jeffrey Runge, M.D.
Administrator
National Highway Traffic Safety Administration
400 Seventh St., S.W.
Washington, D.C. 20590

Re: Docket No. NHTSA-01-11157, Federal Motor Vehicle Safety Standard Notice of Proposed Rulemaking: Tire Safety Information – Labeling

Dear Dr. Runge,

Subaru of America, Inc. (“Subaru”), the distributor for Subaru vehicles in the United States, on behalf of Fuji Heavy Industries, Ltd., the manufacturer of Subaru vehicles, submits the following comments in response to the Notice of Proposed Rulemaking (NPRM) on tire safety information and labeling. Subaru is pleased to have this opportunity to provide its comments to NHTSA on this Proposal [Federal Register/Vol. 66, No. 244/Dec. 19, 2001 pages 65536-67].

A. Vehicle Placard Content

1. In order to use one placard on vehicles sold in both the U.S. and Canada, we request that adding the weight in kilograms be permitted. We also believe that the abbreviations “lb.” for pound and “kg” for kilogram are well understood and would save the limited available space. As with the dual measurements on inflation pressures, we request that the proposed 571.110, S4.3(a) statement read, “THE COMBINED WEIGHT....EXCEED XXX LB (XXX KG).”
2. We believe that the proposed S4.3(a) text is more legible when written as in the Figure 3 sample vehicle placard – with upper and lower case lettering. Therefore, we request that S4.3(a) statement be changed to, “The combined weight....exceed XXX lb. (XXX kg).”
3. A manufacturer could have more than one set of recommended inflation pressures based on the vehicle load, speed, etc. We request that a manufacturer be permitted to use more than one set of recommended inflation pressures on the Figure 4 Tire Inflation Pressure Label.
4. The manufacturer should be permitted to add label identification code, part number, etc. on the placard in order to ensure that the label is correct for that particular vehicle configuration and market.

5. This proposal requires that the original equipment tire size be used on the placard. We suggest that the placard use the heading, "Original Tire Size" instead of just "Tire Size". Because a manufacturer may recommend alternative tire sizes under special conditions (e.g.; snow tires), we also request that a manufacturer be allowed to attach a separate Optional Tire Size label or that an "*" be permitted with "Original Tire Size*" and before "*See Owner's...Information". We believe that this will increase the likelihood that the vehicle operator will refer to the Owner's Manual when fitting other than OE tires.
6. Because the space is also very limited on placards for other than passenger cars (see proposed text for S4.3.1), we request that the abbreviations "lb." for pound and "kg" for kilogram be permitted.

B. Vehicle Placard Format

1. We agree that the location of the placard shall be on the B-pillar, preferably on the driver's side. The driver's side of the B-pillar is not specified in the proposed S4.3 text.
2. We support leaving the overall dimensions of the placard up to the manufacturer. Because of differences in the required information and the B-pillar surface, construction of the placard for maximum legibility, etc. should be as flexible as possible.
3. We support the provision to accept early compliance with the final rule. In other words, manufacturers should have the option of using new placards prior to September 1, 2003 in compliance with the current 571.110, S4.3 requirements.

We appreciate the opportunity to provide the above comments. If there are any questions, please contact myself at (856) 488-8644 or Gerald Plante at (856) 488-3226.

Sincerely,

Don Bearden
Director, Governmental Affairs

cc: Mr. Joseph Scott, Office of Crash Avoidance Standards, NHTSA
Docket Management, Room PL-401, NHTSA, 400 Seventh St. SW, Washington,
DC 20590 (2 copies enclosed plus electronic submission)